

1 Honorable Marc Barreca  
2 May 28, 2015; 1:30 p.m.  
3  
4  
5

6 IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8 In re: ) Chapter 7  
9 TREND SOUND PROMOTER AMG CORP., ) Bankruptcy No. 14-13193  
10 Debtor(s). )  
11 BANKRUPTCY ESTATE OF TREND ) Adversary No. 14-01248  
12 SOUND PROMOTER AMG CORP., )  
by and through Nancy James, Bankruptcy )  
Trustee, )  
13 Plaintiff, )  
14 v. )  
15 VOLODIMYR PIGIDA and JANE DOE )  
PIGIDA, husband and wife, and the marital )  
community comprised thereof, individually )  
and as trustee of the Lakeshore Enterprises )  
Trust; and MARINA BONDARENKO and )  
JOHN DOE BONDARENKO, wife and )  
husband, and the marital community )  
comprised thereof, individually and as trustee )  
of the Lakeshore Enterprises Trust, and )  
SOUND ST STUDIOS LLC, a Washington )  
limited liability company, )  
21 Defendants. )  
22

23 The undersigned makes the following statement under penalty of perjury:  
24  
25 1. I am over 18 years of age, am competent to testify to the statements herein and make  
the statements herein based on facts personally known to me.

**DECLARATION OF JAMES RIGBY  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR PARTIAL SUMMARY JUDGMENT**  
150421eDec Page 1

THE RIGBY LAW FIRM  
600 Stewart Street, Suite 1908  
Seattle, WA 98101  
(206) 755-7600

1           2. Attached hereto as exhibits and incorporated herein by this reference are true and  
2 accurate copies of the following documents which are admissible in evidence:

3           a. Amended Complaint to Recover Fraudulent Conveyance, or in the Alternative to  
4           Recover a Preference, and to Add Party, pp 3-8;  
5           b. Answer and Affirmative Defenses to Plaintiff's First Amended Complaint, pp 9-15;  
6           c. Lakeshore Interrogatories and Answers (Bondarenko as Trustee), pp 16-29;  
7           d. Lakeshore Interrogatories and Answers (Bondarenko Individually), pp 30-43;  
8           e. Lakeshore Interrogatories and Answers (Pigida as Trustee), pp 44-53;  
9           f. Lakeshore Interrogatories and Answers (Pigida Individually), pp 54-65;  
10          g. Lakeshore Second Interrogatory Answers (Pigida Individually), pp 66-77;  
11          h. Lakeshore Second Interrogatory Answers (Lakeshore), pp 78-89;  
12          i. Lakeshore Interrogatory Answers (Bondarenko as Trustee), pp 90-101;  
13          j. Lakeshore Second Interrogatory Answers (Bondarenko Individually), pp 102-113;  
14          k. Lakeshore Second Interrogatory Answers (Pigida as Trustee), pp 114-125;  
15          l. License Agreement dated December 5, 2012, between Soundtrack Studio LLC and  
16           the debtor, pp126-130;  
17          m. State of Washington, Secretary of State, SoundT Studios LLC agents, pp 131-132;  
            and  
            n. SoundT Studios LLC assignments and invoices, pp 133-196.

DATED this 29<sup>th</sup> day of April, 2015.

/S/ *James Rigby*

---

James Rigby

**DECLARATION OF JAMES RIGBY  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

**THE RIGBY LAW FIRM**  
600 Stewart Street, Suite 1908  
Seattle, WA 98101  
(206) 755-7600